

**IN THE DISTRICT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

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UNITED STATES OF AMERICA

Plaintiff,

V.

GORDON L HALL

Defendant.

CASE NO. 6:13-cr-00170-JMC-1

**DEFENDANT'S ACCEPTANCE OF  
AMENDED PETITION TO ENTER PLEA  
OF GUILTY (ECF #222) ON CONDITION  
TO CORRECTION AND REQUEST TO  
FORGIVE FOR MISTAKE  
[filed concurrently with DECLARATION  
IN SUPPORT OF DEFENDANT'S  
ACCEPTANCE OF AMENDED  
PETITION TO ENTER PLEA OF GUILTY  
(ECF #222) ON CONDITION TO  
CORRECTION AND REQUEST TO  
FORGIVE FOR MISTAKE]**

COMES NOW the Defendant, GORDON L. HALL, giving notice of Defendant's conditional acceptance to the "AMENDED PETITION TO ENTER PLEA OF GUILTY" (ECF #222) dated February 18, 2014, hereinafter "PLEA."

The Defendant GORDON L. HALL accepts the PLEA on condition that the PLEA is corrected to reflect "Yes" instead of "No" to question #42(a) in the PLEA. Additionally on condition that ECF #225 "PETITION FOR ENTRY OF AMENDED PLEA AGREEMENT OR EXTENSION OF TIME [filed concurrently with DECLARATION IN SUPPORT OF PETITION FOR ENTRY OF AMENDED PLEA AGREEMENT OR EXTENSION OF TIME]" is incorporated into the PLEA as an integral part of the PLEA (ECF #222).

Defendant's mistake was a misconception that ECF #225 would automatically be incorporated into the plea agreement of February 7, 2014, and subsequently into the plea

agreement of February 18, 2014 (ECF #222), the "PLEA," pursuant to the Government's non response to the E-Mails of February 13<sup>th</sup> and February 16<sup>th</sup> 2014 as the apparent intent of the parties made manifest by their actions, including but not limited to similar contracts concerning ECF #'s 82, 192, 193, 225, et cetera as the true intent of the parties that the matter having been properly resolved by the Government and the Defendant agreeing to recommend the provisions of ECF #192 as a particular sentence proper for the disposition of this instant Case. Defendant's mistake was realizing that "No" on question #42(a) of the PLEA corresponded and was correct under Traditional Contract Law, however, under Modern Contract Law the answer to question #42(a) of the PLEA should have been "Yes" in accordance with ECF #192 as made manifest by the Record. For any offense, inconvenience, et cetera the Defendant has caused the Court and the Government, the Defendant has but two words, "FORGIVE ME."

### CONCLUSION

WHEREFORE, the Defendant Petitions this Court to correct the PLEA (Question #42(a) to reflect "Yes") by accepting the recommendations and provisions in ECF #192 as a particular sentence proper for the disposition of this instant Case and grant such other and further relief as is just and proper.

Respectfully submitted this 20<sup>th</sup> day of February 2014,

GORDON L HALL

A handwritten signature in black ink, appearing to read "Gordon Hall L.P.", written over a horizontal line.